

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF OKLAHOMA

3 STATE OF OKLAHOMA

PLAINTIFF

4 VERSUS

NO. 4:05-CV-00329-GKF-SAJ

5 TYSON FOODS, INC., ET AL.

DEFENDANTS

6 *****

7
8 VIDEOTAPED 30(B)(6) DEPOSITION OF CAL-MAINE FOODS
9 STEVE STORM
10 VOLUME II

11 *****

12 APPEARANCES NOTED HEREIN

13 TAKEN AT INSTANCE OF: PLAINTIFF

14 DATE: OCTOBER 9, 2007

15 PLACE: YOUNG WILLIAMS, P.A.

210 E. JCAPITOL STREET, SUITE 2000

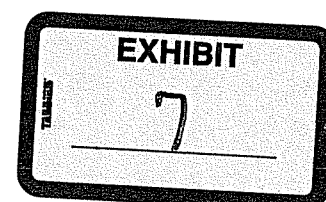
16 JACKSON, MISSISSIPPI

TIME: 9:00 a.m.

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18
19
20
21
22 REPORTED BY: AMANDA M. WOOTTON, CSR, RPR

23 _____
24 WOOTTON REPORTING
25 338 Indian Gate Circle
Ridgeland, Mississippi 39157
(601) 898-9990

Wootton Reporting
601-898-9990



1 Q We might be finished with this part of
2 the deposition except there are four other
3 topics in that notice that Mr. Garren is going
4 cover with you. Let me check a couple of notes
5 here.

6 I have -- I have another question or
7 two, I guess, and I'll be finished.

8 Has Cal-Maine ever taken any steps in
9 the Illinois River Watershed in particular to
10 determine if any of the place that it had
11 been -- was land applied there from 1990 up to
12 2005 had run off the land or leached into the
13 ground water?

14 MR. GRAVES: I'm going to object.

15 You've already asked that question.

16 MR. SANDERS: Asked and answered.

17 A No. Cal-Maine doesn't know
18 specifically any details about the application
19 by the -- by the contract producers.

20 MR. RIGGS: Okay. There are those
21 four other topics, the last four on
22 that notice that Mr. Garren is going
23 to inquire about.

24 MR. GARREN: Let's take a break.

25 BY THE VIDEO REPORTER: Off the

1 one farm in line to a plant.

2 Q Okay. Is it Cal-Maine's intention to
3 grow its operations that were Georgia's
4 commercial egg operation?

5 A I don't understand. Do we want to
6 make it larger?

7 Q Yes, sir.

8 A At this point, it's not our intention.

9 Q Okay. I know that in the annual
10 reports, that is one of the mission statements
11 or goals, if you will, for Cal-Maine, is to
12 continue to grow.

13 A Through acquisition.

14 Q And through acquisition.

15 A Primarily through acquisition.

16 Q You talked a little bit yesterday
17 about vertical integration and I think attempted
18 to explain a little bit how that works. Does
19 Cal-Maine consider itself to be a vertical
20 integrated company?

21 A I think, yes.

22 Q Does Cal-Maine own land in Oklahoma
23 today?

24 A Benton County Foods, LLC does.

25 Q All right. And it owns --